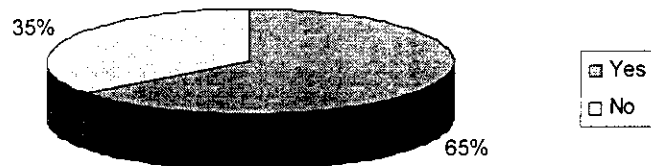


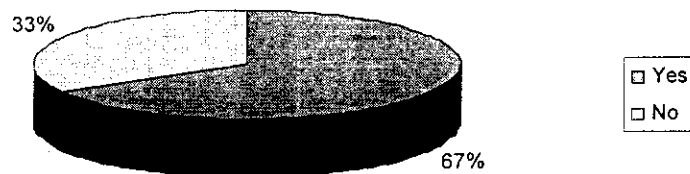
Of the 820 residential customers in the 419 area code that responded to the survey, 797 entered an opinion for Question 2. Of the 797, 516 or 64.7% answered "Yes," it would be acceptable for all wireless telephone numbers to have an area code that is different from that of landline telephone numbers. Conversely, there were 281 or 35.3% that answered "No" to Question 2.

Question 2

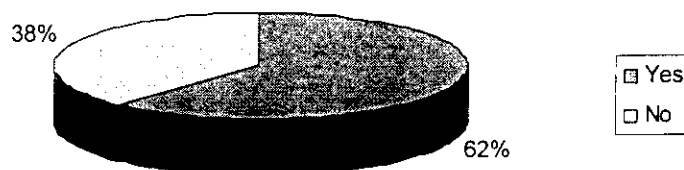


Of the 455 residential customers who indicated that they subscribe to wireless service (Question 3), 303 or 66.6% answered that it would be acceptable for all wireless numbers to have an area code that is different from that of landline telephone numbers. There were 152 or 33.4% that responded that it would not be acceptable. Of the 342 customers who indicated that they do not subscribe to wireless service, 213 or 62.3% reported that it would be acceptable, while 129 or 37.7% responded that it would not be acceptable.

Subscribe to Wireless



Do Not Subscribe to Wireless



419 Business Customers

Option 1 Geographic Split: The area code continues to identify an exclusive geographic area. Each area would have only one area code. Using this approach, as the available telephone numbers within an area code are depleted, the geographic areas would continue to be split into smaller geographic areas and new area codes would be introduced requiring some people to change their existing area code. Local calls within the area code geographic boundary would continue to be performed by dialing seven digits (for example, 555-5555). A geographic split generally requires some communities to have more than one area code due to technical limitations of the numbering system.

Option 2 Overlay: All existing telephone numbers with the same area code would remain the same indefinitely; however, new telephone lines in the same area would be assigned telephone numbers with a new area code. Using this approach, it is possible that new additional telephone lines in the same house or business could receive an area code different from that of existing lines. All calls, local and long distance, would require callers to dial ten or eleven digits (for example, (555)555-5555 or 1-(555)555-5555).

Please check only one box to indicate your preference for the above two options:

Option 1

Option 2

The Federal Communications Commission currently prohibits an area code being assigned exclusively to wireless telephones. However, so that we can better understand public opinion on this issue, we ask that you respond to these additional questions regarding wireless technologies.

Would it be acceptable for all wireless numbers (e.g., pagers, cellular phones, or PCS phones) to have an area code that is different from that of landline telephone numbers?

YES

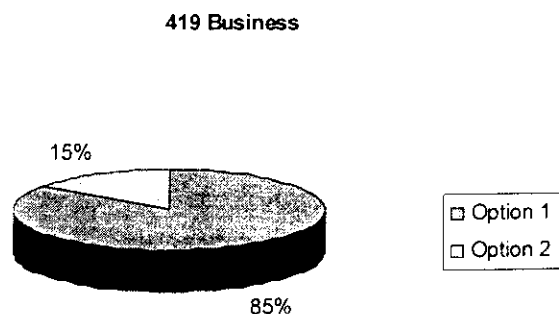
NO

Do you subscribe to wireless service (e.g., pager, cellular service or PCS service)?

YES

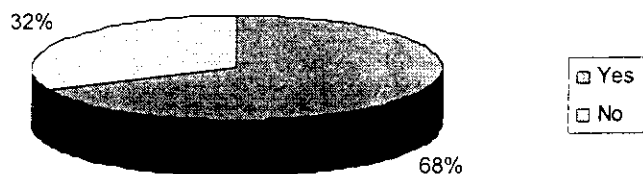
NO

Of the 1,218 business customers in the 419 area code that responded to the survey, 1,181 entered an opinion for Question 1. Of the 1,181, 999 or 84.6% selected Option 1 and 182 or 15.4% selected Option 2.



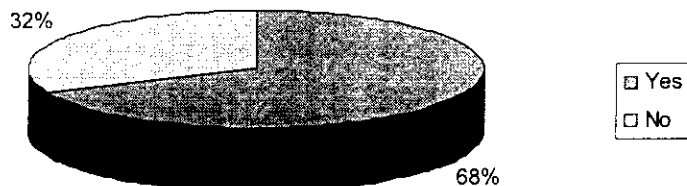
Of the 1,218 business customers in the 419 area code that responded to the survey, 1,198 entered an opinion for Question 2. Of the 1,198, 818 or 68.3% answered "Yes," it would be acceptable for all wireless telephone numbers to have an area code that is different from that of landline telephone numbers. Conversely, there were 380 or 31.7% that answered "No" to Question 2.

Question 1

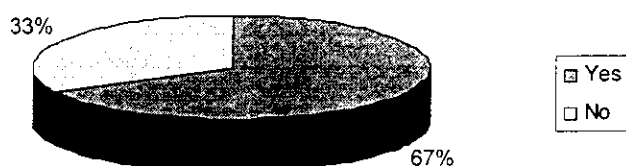


Of the 1,030 business customers who indicated that they subscribe to wireless service (Question 3), 705 or 68.4% answered that it would be acceptable for all wireless numbers to have an area code that is different from that of landline telephone numbers. There were 325 or 31.6% that responded that it would not be acceptable. Of the 168 customers who indicated that they do not subscribe to wireless service, 113 or 67.3% answered that it would be acceptable, while 55 or 32.7% responded that it would not be acceptable.

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440 Residential Customers

Option 1 Geographic Split: The area code continues to identify an exclusive geographic area. Each area would have only one area code. Using this approach, as the available telephone numbers within an area code are depleted, the geographic areas would continue to be split into smaller geographic areas and new area codes would be introduced requiring some people to change their existing area code. Local calls within the area code geographic boundary would continue to be performed by dialing seven digits (for example, 555-5555). A geographic split generally requires some communities to have more than one area code due to technical limitations of the numbering system.

Option 2 Overlay: All existing telephone numbers with the same area code would remain the same indefinitely; however, new telephone lines in the same area would be assigned telephone numbers with a new area code. Using this approach, it is possible that new additional telephone lines in the same house or business could receive an area code different from that of existing lines. All calls, local and long distance, would require callers to dial ten or eleven digits (for example, (555)555-5555 or 1-(555)555-5555).

Please check only one box to indicate your preference for the above two options:

Option 1

Option 2

The Federal Communications Commission currently prohibits an area code being assigned exclusively to wireless telephones. However, so that we can better understand public opinion on this issue, we ask that you respond to these additional questions regarding wireless technologies.

Would it be acceptable for all wireless numbers (e.g., pagers, cellular phones, or PCS phones) to have an area code that is different from that of landline telephone numbers?

YES

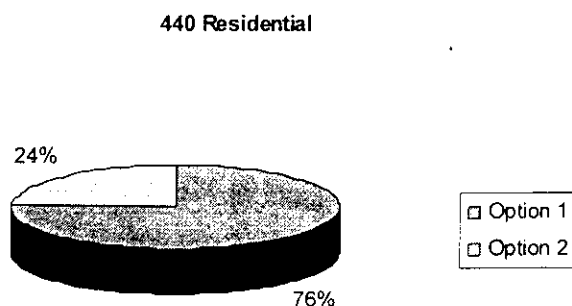
NO

Do you subscribe to wireless service (e.g., pager, cellular service or PCS service)?

YES

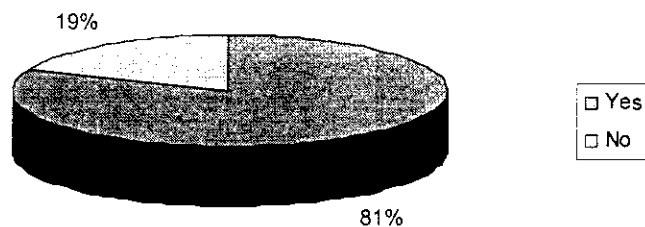
NO

Of the 1,185 residential customers in the 440 area code that responded to the survey, 1,125 entered an opinion for Question 1. Of the 1,125, 855 or 76.0% selected Option 1 and 270 or 24.0% selected Option 2.



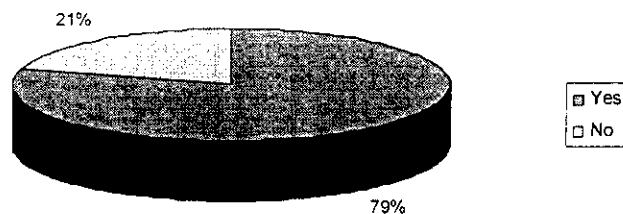
Of the 1,185 residential customers in the 440 area code that responded to the survey, 1,158 entered an opinion for Question 2. Of the 1,158, 943 or 81.4% answered "Yes," it would be acceptable for all wireless telephone numbers to have an area code that is different from that of landline telephone numbers. Conversely, there were 215 or 18.6% that answered "No" to Question 2.

Question 2

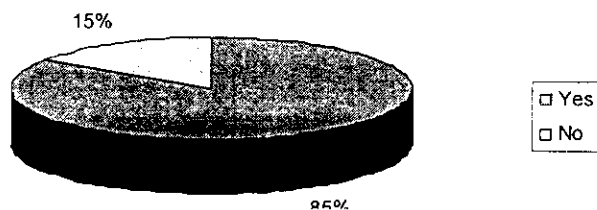


Of the 711 residential customers who indicated that they subscribe to wireless service (Question 3), 565 or 79.5% answered that it would be acceptable for all wireless numbers to have an area code that is different from that of landline telephone numbers. There were 146 or 20.5% that responded that it would not be acceptable. Of the 440 customers who indicated that they do not subscribe to wireless service, 372 or 84.5% reported that it would be acceptable, while 68 or 15.5% responded that it would not be acceptable.

Subscribe to Wireless



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440 Business Customers

Option 1 Geographic Split: The area code continues to identify an exclusive geographic area. Each area would have only one area code. Using this approach, as the available telephone numbers within an area code are depleted, the geographic areas would continue to be split into smaller geographic areas and new area codes would be introduced requiring some people to change their existing area code. Local calls within the area code geographic boundary would continue to be performed by dialing seven digits (for example, 555-5555). A geographic split generally requires some communities to have more than one area code due to technical limitations of the numbering system.

Option 2 Overlay: All existing telephone numbers with the same area code would remain the same indefinitely; however, new telephone lines in the same area would be assigned telephone numbers with a new area code. Using this approach, it is possible that new additional telephone lines in the same house or business could receive an area code different from that of existing lines. All calls, local and long distance, would require callers to dial ten or eleven digits (for example, (555)555-5555 or 1-(555)555-5555).

Please check only one box to indicate your preference for the above two options:

Option 1

Option 2

The Federal Communications Commission currently prohibits an area code being assigned exclusively to wireless telephones. However, so that we can better understand public opinion on this issue, we ask that you respond to these additional questions regarding wireless technologies.

Would it be acceptable for all wireless numbers (e.g., pagers, cellular phones, or PCS phones) to have an area code that is different from that of landline telephone numbers?

YES

NO

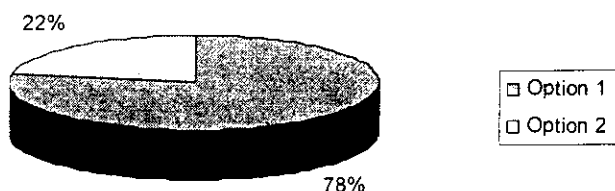
Do you subscribe to wireless service (e.g., pager, cellular service or PCS service)?

YES

NO

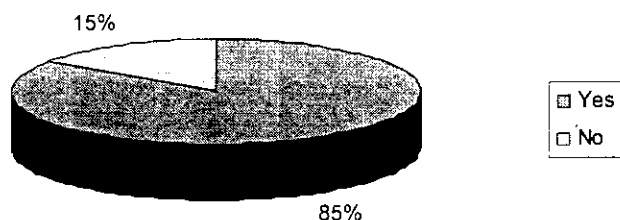
Of the 1,150 business customers in the 440 area code that responded to the survey, 1,080 entered an opinion for Question 1. Of the 1,080, 838 or 77.6% selected Option 1 and 242 or 22.4% selected Option 2.

440 Business



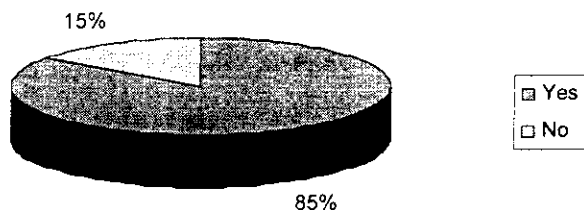
Of the 1,150 business customers in the 440 area code that responded to the survey, 1,138 entered an opinion for Question 2. Of the 1,138, 965 or 84.8% answered "Yes," it would be acceptable for all wireless telephone numbers to have an area code that is different from that of landline telephone numbers. Conversely, there were 173 or 15.2% that answered "No" to Question 2.

Question 2

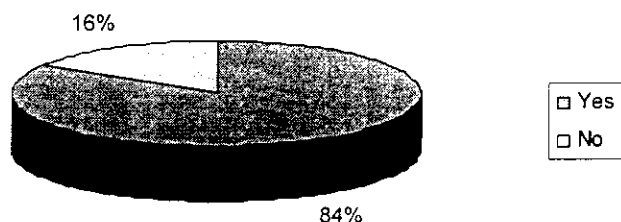


Of the 989 business customers who indicated that they subscribe to wireless service (Question 3), 838 or 84.7% answered that it would be acceptable for all wireless numbers to have an area code that is different from that of landline telephone numbers. There were 151 or 15.3% that responded that it would not be acceptable. Of the 137 customers who indicated that they do not subscribe to wireless service, 115 or 83.9% reported that it would be acceptable, while 22 or 16.1% responded that it would not be acceptable.

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513 Residential Customers

Option 1 Geographic Split: The area code continues to identify an exclusive geographic area. Each area would have only one area code. Using this approach, as the available telephone numbers within an area code are depleted, the geographic areas would continue to be split into smaller geographic areas and new area codes would be introduced requiring some people to change their existing area code. Local calls within the area code geographic boundary would continue to be performed by dialing seven digits (for example, 555-5555). A geographic split generally requires some communities to have more than one area code due to technical limitations of the numbering system.

Option 2 Overlay: All existing telephone numbers with the same area code would remain the same indefinitely; however, new telephone lines in the same area would be assigned telephone numbers with a new area code. Using this approach, it is possible that new additional telephone lines in the same house or business could receive an area code different from that of existing lines. All calls, local and long distance, would require callers to dial ten or eleven digits (for example, (555)555-5555 or 1-(555)555-5555).

Please check only one box to indicate your preference for the above two options:

Option 1

Option 2

The Federal Communications Commission currently prohibits an area code being assigned exclusively to wireless telephones. However, so that we can better understand public opinion on this issue, we ask that you respond to these additional questions regarding wireless technologies.

Would it be acceptable for all wireless numbers (e.g., pagers, cellular phones, or PCS phones) to have an area code that is different from that of landline telephone numbers?

YES

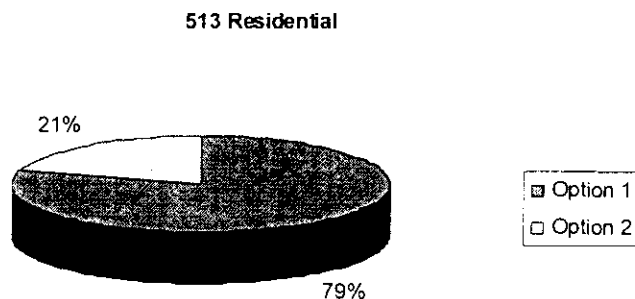
NO

Do you subscribe to wireless service (e.g., pager, cellular service or PCS service)?

YES

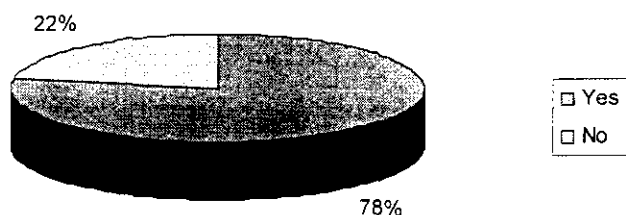
NO

Of the 924 residential customers in the 513 area code that responded to the survey, 895 entered an opinion for Question 1. Of the 895, 711 or 79.4% selected Option 1 and 184 or 20.6% selected Option 2.



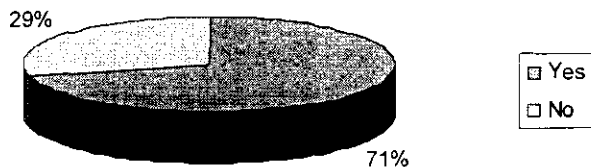
Of the 924 residential customers in the 513 area code that responded to the survey, 918 entered an opinion for Question 2. Of the 918, 661 or 72.0% answered "Yes," it would be acceptable for all wireless telephone numbers to have an area code that is different from that of landline telephone numbers. Conversely, there were 257 or 28.0% that answered "No" to Question 2.

Question 2

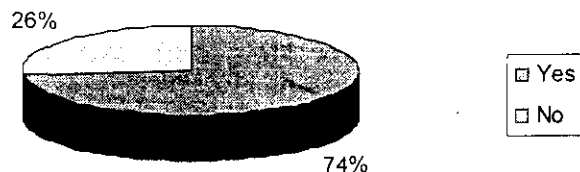


Of the 550 residential customers who indicated that they subscribe to wireless service (Question 3), 388 or 70.5% answered that it would be acceptable for all wireless numbers to have an area code that is different from that of landline telephone numbers. There were 162 or 29.5% that responded that it would not be acceptable. Of the 359 customers who indicated that they do not subscribe to wireless service, 264 or 73.5% reported that it would be acceptable, while 95 or 26.5% responded that it would not be acceptable.

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513 Business Customers

Option 1 Geographic Split: The area code continues to identify an exclusive geographic area. Each area would have only one area code. Using this approach, as the available telephone numbers within an area code are depleted, the geographic areas would continue to be split into smaller geographic areas and new area codes would be introduced requiring some people to change their existing area code. Local calls within the area code geographic boundary would continue to be performed by dialing seven digits (for example, 555-5555). A geographic split generally requires some communities to have more than one area code due to technical limitations of the numbering system.

Option 2 Overlay: All existing telephone numbers with the same area code would remain the same indefinitely; however, new telephone lines in the same area would be assigned telephone numbers with a new area code. Using this approach, it is possible that new additional telephone lines in the same house or business could receive an area code different from that of existing lines. All calls, local and long distance, would require callers to dial ten or eleven digits (for example, (555)555-5555 or 1-(555)555-5555).

Please check only one box to indicate your preference for the above two options:

Option 1

Option 2

The Federal Communications Commission currently prohibits an area code being assigned exclusively to wireless telephones. However, so that we can better understand public opinion on this issue, we ask that you respond to these additional questions regarding wireless technologies.

Would it be acceptable for all wireless numbers (e.g., pagers, cellular phones, or PCS phones) to have an area code that is different from that of landline telephone numbers?

YES

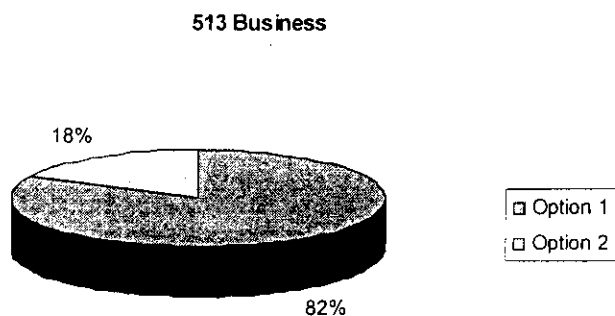
NO

Do you subscribe to wireless service (e.g., pager, cellular service or PCS service)?

YES

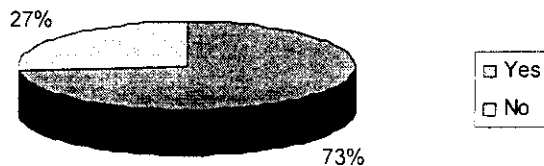
NO

Of the 1,021 business customers in the 513 area code that responded to the survey, 986 entered an opinion for Question 1. Of the 986, 812 or 82.4% selected Option 1 and 174 or 17.6% selected Option 2.



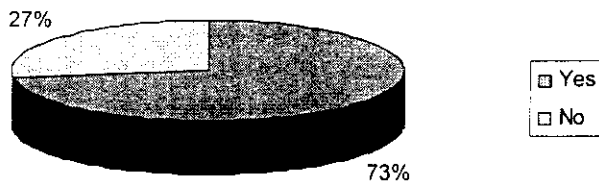
Of the 1,021 business customers in the 513 area code that responded to the survey, 1,013 entered an opinion for Question 2. Of the 1,013, 740 or 73.1% answered "Yes," it would be acceptable for all wireless telephone numbers to have an area code that is different from that of landline telephone numbers. Conversely, there were 273 or 26.9% that answered "No" to Question 2.

Question 2

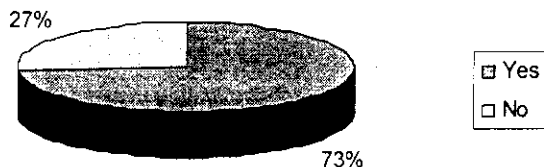


Of the 877 business customers who indicated that they subscribe to wireless service (Question 3), 637 or 72.6% answered that it would be acceptable for all wireless numbers to have an area code that is different from that of landline telephone numbers. There were 240 or 27.4% that responded that it would not be acceptable. Of the 123 customers who indicated that they do not subscribe to wireless service, 90 or 73.2% reported that it would be acceptable, while 33 or 26.8% responded that it would not be acceptable.

Subscribe to Wireless



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Comparative Analysis: Residential and Business Customers

330 Residential and Business

When comparing the residential and business customers in the 330 area code there were 78.6% of the residential customers and 80.0% of the business customers that chose Option 1 (Geographic Split). Conversely, there were 21.4% of the residential customers and 20.0% of the business customers that chose Option 2 (Overlay).

In response to Question 2, there were 69.9% of the residential customers selecting "Yes," it would be acceptable for all wireless telephone numbers to have an area code that is different from that of landline telephone numbers, as compared to 73.8% of the business customers. Conversely, there were 30.1% of the residential customers that responded "No," as compared to 26.2% of the business customers that responded that it would not be acceptable.

In response to Question 3, there were 68.9% of the residential customers and 74.3% of the business customers that subscribe to a wireless service and responded that it would be acceptable for all wireless telephone numbers to have an area code that is different from that of landline telephone numbers. Conversely, there were 31.1% of the residential customers and 25.7% of the business customers that subscribe to a wireless service that responded "No" to Question 2.

Further analysis to Question 3 revealed there were 70.0% of the residential customers and 70.7% of the business customers that do not subscribe to a wireless service and responded that it would be acceptable for all wireless telephone numbers to have an area code that is different from that of landline numbers. Conversely, there were 30.0% of the residential customers and 29.3% of the business customers that do not subscribe to a wireless service that responded "No" to Question 2.

419 Residential and Business

When comparing the residential and business customers in the 419 area code, there were 79.0% of the residential customers and 84.6% of the business customers that chose Option 1 (Geographic Split). Conversely, there were 21.0% of the residential customers and 15.4% of the business customers that chose Option 2 (Overlay).

In response to Question 2, there were 64.7% of the residential customers selecting "Yes," it would be acceptable for all wireless telephone numbers to have an area code that is different from that of landline telephone numbers, as compared to 68.3% of the business customers. Conversely, there were 35.3% of the residential customers that responded "No," as compared to 31.7% of the business customers that responded that it would not be acceptable.

In response to Question 3, there were 66.6% of the residential customers and 68.4% of the business customers that subscribe to a wireless service and responded that it would be acceptable for all wireless telephone numbers to have an area code that is different from that of landline telephone numbers. Conversely, there were 33.4% of the residential customers and 31.6% of the business customers that subscribe to a wireless service that responded "No" to Question 2.

Further analysis to Question 3 revealed there were 62.3% of the residential customers and 67.3% of the business customers that do not subscribe to a wireless service and responded that it would be acceptable for all wireless telephone numbers to have an area code that is different from that of landline numbers. Conversely, there were 37.7% of the residential customers and 32.7% of the business customers that do not subscribe to a wireless service that responded "No" to Question 2.

440 Residential and Business

When comparing the residential and business customers in the 440 area code, there were 76.0% of the residential customers and 77.6% of the business customers that chose Option 1 (Geographic Split). Conversely, there were 24.0% of the residential customers and 22.4% of the business customers that chose Option 2 (Overlay).

In response to Question 2, there were 81.4% of the residential customers selecting "Yes," it would be acceptable for all wireless telephone numbers to have an area code that is different from that of landline telephone numbers, as compared to 84.8% of the business customers. Conversely, there were 18.6% of the residential customers that responded "No," as compared to 15.2% of the business customers that responded that it would not be acceptable.

In response to Question 3, there were 79.5% of the residential customers and 84.7% of the business customers that subscribe to a wireless service and responded that it would be acceptable for all wireless telephone numbers to have an area code that is different from that of landline telephone numbers. Conversely, there were 20.5% of the residential customers and 15.3% of the business customers that subscribe to a wireless service that responded "No" to Question 2.

Further analysis to Question 3 revealed there were 84.5% of the residential customers and 83.9% of the business customers that do not subscribe to a wireless service and responded that it would be acceptable for all wireless telephone numbers to have an area code that is different from that of landline numbers. Conversely, there were 15.5% of the residential customers and 16.1% of the business customers that do not subscribe to a wireless service that responded "No" to Question 2.

513 Residential and Business

When comparing the residential and business customers in the 513 area code, there were 79.4% of the residential customers and 82.4% of the business customers that chose Option 1 (Geographic Split). Conversely, there were 20.6% of the residential customers and 17.6% of the business customers that chose Option 2 (Overlay).

In response to Question 2, there were 72.0% of the residential customers selecting "Yes," it would be acceptable for all wireless telephone numbers to have an area code that is different from that of landline telephone numbers, as compared to 73.1% of the business customers. Conversely, there were 28.0% of the residential customers that responded "No," as compared to 26.9% of the business customers that responded that it would not be acceptable.

In response to Question 3, there were 70.5% of the residential customers and 72.6% of the business customers that subscribe to a wireless service and responded that it would be acceptable for all wireless telephone numbers to have an area code that is different from that of landline telephone numbers. Conversely, there were 29.5% of the residential customers and 27.4% of the business customers that subscribe to a wireless service that responded "No" to Question 2.

Further analysis to Question 3 revealed there were 73.5% of the residential customers and 73.2% of the business customers that do not subscribe to a wireless service and responded that it would be acceptable for all wireless telephone numbers to have an area code that is different from that of landline numbers. Conversely, there were 26.5% of the residential customers and 26.8% of the business customers that do not subscribe to a wireless service that responded "No" to Question 2.

Comparative Analysis: Area Code Regions

When comparing the percentage response rates for Option 1 across the four area code regions, there was no appreciable difference between the residential customers in their choice of options. The highest response rate was for Option 1. The business customers across the four area code regions chose Option 1 as their highest rated preference. The business customer percentage response rate for Option 1 across all of the area code regions was slightly higher as compared to the residential response rates.

Area Code Residential

Question 1	Option 1	Option 2
330	78.6%	21.4%
419	79.0%	21.0%
440	76.0%	24.0%
513	79.4%	20.6%

Area Code Business

Question 1	Option 1	Option 2
330	80.0%	20.0%
419	84.6%	15.4%
440	77.6%	22.4%
513	82.4%	17.6%

Question 2 asked the respondents if it would be acceptable for all wireless numbers to have an area code that is different from that of landline telephone numbers. The results from Question 2 demonstrated greater variability in responses across the four area code regions than was evidenced in response to Question 1 concerning the geographic split and overlay options. For the residential customers, all of the response frequencies were greater than 60%, indicating that the majority of respondents report that it is acceptable to have different area codes for wireless numbers. The highest response was 81.4% reported by the residential customers of the 440 region. There was slightly less variability among the business customer responses. With the exception of the 419 region, more than 70% of the business customers reported that it would be acceptable for wireless numbers to have a different area code from that of landline telephone numbers. There were 68.3% of the business customers in the 419 region reporting that it would be acceptable. Interestingly, as was the case with the residential respondents, the business customers in the 440 region reported the highest approval for this approach with an 84.8% response.

Area Code Residential			Area Code Business		
Question 2	YES	NO	Question 2	YES	NO
330	69.9%	30.1%	330	73.8%	26.2%
419	64.7%	35.3%	419	68.3%	31.7%
440	81.4%	18.6%	440	84.8%	15.2%
513	72.0%	28.0%	513	73.1%	26.9%

The table below indicates the percentage response rates for residential and business customers that are subscribers of wireless service that report it would be acceptable for all wireless telephone numbers to have an area code that is different from that of landline telephone numbers (Question 2). The percentage response rate for residential and business customers in the 440 area code region were slightly higher as compared to the other area code regions. The results across area code regions and between residential and business customers are quite similar.

Area Code Residential			Area Code Business		
Question 2	Yes	No	Question 2	Yes	No
330	68.9%	31.1%	330	74.3%	25.7%
419	66.6%	33.4%	419	68.4%	31.6%
440	79.5%	20.5%	440	84.7%	15.3%
513	70.5%	29.5%	513	72.6%	27.4%



**Attorney General
Betty D. Montgomery**

September 10, 1999

Via Overnight Mail

Office of the Secretary
Magalie Salas
Federal Communications Commission
445 12th St. S.W.
Portals II Building
Washington, D.C. 20554

RECEIVED

SEP 13 1999

FCC MAIL ROOM

Re: *In the Matter of Implementation of the Local
Competition Provisions in the
Telecommunications Act of 1996, Petition for
Declaratory Ruling and Request for Expedited
Action on July 15, 1997 Order of the
Pennsylvania Public Utility Commission
Regarding Area Code 412, 610, 215 and 717.*

Dear Mr. Salas:

Enclosed please find the original and seventeen copies including attachments of the above captioned matter in CC Docket No. 96-98. The enclosed documents were also filed electronically today via the FCC's electronic filing system. Please return a time-stamped copy to me in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this matter.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Robert A. Abrams".

Robert A. Abrams
Jodi J. Bair
Assistant Attorney General
Public Utilities Section
180 East Broad Street
Columbus, Ohio 43266-0573
(614) 466-4397

JJB:RAA:kja

State Office Tower / 30 East Broad Street / Columbus, Ohio 43215-3428

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